

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)
)
CUMMINGS MANOOKIAN, PLLC,) Case No. 3:19-bk-07235
Debtor.) Chapter 7
) Judge Walker
JEANNE ANN BURTON, TRUSTEE,)
)
Plaintiff,)
)
v.)
)
HAGH LAW, PLLC; AFSOON)
HAGH; MANOOKIAN, PLLC; and)
FIRST-CITIZENS BANK & TRUST)
COMPANY,)
Defendants.)
) Adv. Proc. No. 3:20-ap-90002

NOTICE REGARDING DEPOSITION OF MARTY FITZGERALD

Jeanne Ann Burton, Chapter 7 Trustee and Plaintiff in this action, respectfully gives notice that, despite the timely issuance of two subpoenas, the Trustee has not been afforded an opportunity to depose Marty Fitzgerald via Zoom, as requested in the subpoenas. The deadline for completing discovery is currently June 30, 2022. In light of the Court's oral statement on June 29, 2022 concerning its limited jurisdiction in this matter, the Trustee will not be filing a motion to compel the testimony of Mr. Fitzgerald until the conclusion of the pending appeal in this matter. However, the Trustee reserves the right to file such a motion in the future.

Dated: June 30, 2022

Respectfully Submitted,

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.
Thompson Burton PLLC
One Franklin Park
6100 Tower Circle, Suite 200
Franklin, TN 37067
Tel: 615.465.6008
Fax: 615.807.3048
Email: phillip@thompsonburton.com

Special Counsel for Jeanne Ann Burton,
Trustee

Certificate of Service

The undersigned hereby certifies that a true and exact copy of the foregoing has been served via electronic notice/ECF on all parties having made an appearance herein.

This 30th day of June, 2022.

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.